

EXHIBIT A

Case Number: KC-2021-0844
Filed in Kent County Superior Court
Submitted: 9/21/2021 11:28 AM
Envelope: 3291778
Reviewer: Takesha L.

STATE OF RHODE ISLAND

SUPERIOR COURT

KENT, SC

JANET MESSIER,

Plaintiff,

v.

C.A. No. KC-2021-_____

TARGET CORPORATION, alias,

Defendant.

COMPLAINT

PARTIES

1. JANET MESSIER is a resident of the Town of West Warwick, Kent County, State of Rhode Island.
2. TARGET CORPORATION is a foreign corporation. Its principal place of business is located at 1000 Nicollet Mall, Minneapolis, Minnesota. TARGET is authorized to do business in the State of Rhode Island, is doing business within the state, and is operating a retail store open to the public located at 1245 Bald Hill Road, Warwick, Rhode Island.

JURISDICTION and VENUE

3. The amount in controversy is sufficient to establish the jurisdiction of this Honorable Court.
4. Kent County is the appropriate venue, as the incident giving rise to this action occurred within said Kent County.

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FACTS

5. On or about October 5, 2018, at 6:30 pm, JANET MESSIER was an invitee at property owned, operated, and/or maintained by TARGET CORPORATION, which is located at 1245 Bald Hill Road, Warwick, Rhode Island.
6. At all times material hereto, JANET MESSIER was in the exercise of due caution and care.
7. At all times relevant hereto, TARGET CORPORATION was responsible for the maintenance, upkeep, and safety of the premises for all invitees.
8. At all times relevant hereto, TARGET CORPORATION failed to maintain the premises in a reasonably safe manner.

COUNT I -- NEGLIGENCE

9. JANET MESSIER realleges paragraphs 1 through 8 as though set forth herein.
10. At all times relevant hereto, TARGET CORPORATION owed a duty to JANET MESSIER to maintain all areas of its premises in a reasonably safe condition for her passage thereon and/or use thereof.
11. While JANET MESSIER was lawfully on the premises, TARGET CORPORATION's store's interior, by its women's rest room area, was in an unsafe, dangerous and/or defective condition.
12. On or about October 5, 2018, Defendant, TARGET CORPORATION knew or should have known of such area being in an unsafe, dangerous, and/or defective condition.
13. On or about June 18, 2018, the Defendant, TARGET CORPORATION breached its duty owed to the Plaintiff, JANET MESSIER, in that said Defendant:
 - a) willfully and/or recklessly and/or negligently permitted and allowed said area to be and remain in such unsafe, dangerous and/or defective condition;

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- b) willfully and/or recklessly and/or negligently failed to warn the Plaintiff of said unsafe, dangerous and/or defective condition; and/or,
 - c) willfully and/or recklessly and/or negligently failed to repair or maintain said area in a condition which was reasonably safe for her passage thereon and use thereof.
14. As a direct and proximate result of said area being in an unsafe, dangerous and/or defective condition, JANET MESSIER, slipped and fell and was injured
15. As a further direct and proximate result of the breach of duty of the Defendant, TARGET CORPORATION, Plaintiff, JANET MESSIER, sustained personal injuries, suffered pain of the body and mind, incurred expenses for necessary medical care and treatment, suffered a loss of enjoyment of life, suffered a loss of earnings and/or earning capacity.

WHEREFORE, JANET MESSIER demands judgment against TARGET CORPORATION and general and special damages in a monetary amount sufficient to satisfy the jurisdiction of the Superior Court, plus interest and costs.

PLAINTIFF DEMANDS TRIAL BY JURY AS TO ALL ISSUES SO TRIABLE.

Plaintiff,
By Counsel,

/s/ Michael F. Campopiano
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Date: